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*Counsel for Sears Holdings Corporation and
its debtor affiliates, as debtors and debtors in possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.¹

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

**FIRST MONTHLY FEE STATEMENT OF ASK LLP FOR PROFESSIONAL
SERVICES RENDERED AND DISBURSEMENTS INCURRED AS COUNSEL
TO THE LITIGATION DESIGNEES FOR THE PERIOD OF
SEPTEMBER 22, 2020 THROUGH NOVEMBER 30, 2020**

Name of Applicant:	ASK LLP
Authorized to Provide Services to:	Litigation Designees ²
Retention Date:	June 26, 2019 nunc pro tunc to April 1, 2019 as to retention as special avoidance action counsel to the Debtors; September 22, 2020 as to retention as counsel to the Litigation Designees for the Jointly Asserted Causes of Action ³
Period for Which Compensation and Reimbursement Is Sought	September 22, 2020 through November 30, 2020
Monthly Fees Incurred:	\$71,026.70
Monthly Expenses Incurred:	\$1,026.60
Total Fees and Expenses Requested:	\$72,053.30
This is a <u> x </u> monthly <u> </u> interim <u> </u> final	

² Pursuant to the *Order (I) Confirming Modified Second Amended Joint Chapter 11 Plan of Sears Holdings Corporation and Its Affiliated Debtors and (II) Granting Related Relief* (the "Confirmation Order") [D.I. 529], the Litigation Designees shall comprise (a) Patrick J. Bartels, (b) Eugene I. Davis, and (c) Raphael T. Wallander, as the Creditors' Committee's designees, and (x) Alan J. Carr and (y) William L. Transier, as the Debtors' designees, which designees shall become the initial members of the Liquidating Trust Board upon the Effective Date pursuant to Section 10.6(a) of the Plan.

³ The Confirmation Order, among other things, granted the Creditors' Committee joint standing with the Debtors to prosecute the Jointly Asserted Causes of Action, subject to the oversight of the Litigation Designees, which designees shall become the initial members of the Liquidating Trust Board upon the effective date of the Plan. The Jointly Asserted Causes of Action are those actions defined in paragraph 17 of the Confirmation Order.

ASK LLP (“ASK”), counsel to the Litigation Designees, which designees were identified pursuant to the Confirmation Order for Sears Holdings Corporation and its affiliated debtors and debtors in possession (collectively, the “Debtors”), hereby submits this statement of fees and disbursements (the “First Monthly Fee Statement”) covering the period from September 22, 2020 through and including November 30, 2020 (the “Compensation Period”) in accordance with the *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (the “Interim Compensation Order”) [ECF No. 796]. By the First Monthly Fee Statement, ASK requests (a) interim allowance and payment of compensation in the amount of \$71,026.70 for fees on account of reasonable and necessary professional services rendered to the Litigation Designees by ASK and (b) reimbursement of actual and necessary costs and expenses in the amount of \$1,026.60 incurred by ASK during the Compensation Period.

**FEES FOR SERVICES RENDERED
DURING THE COMPENSATION PERIOD**

Exhibit A sets forth a timekeeper summary that includes the respective names, positions, hourly billing rates and aggregate hours spent by each ASK professional and paraprofessional who provided services to the Litigation Designees during the Compensation Period. The rates charged by ASK for services rendered to the Litigation Designees are the same rates that ASK charges generally for professional services rendered to all hourly bankruptcy clients.

Exhibit B sets forth a complete itemization of tasks performed by ASK professionals and paraprofessionals who provided services to the Litigation Designees during the Compensation Period.

**EXPENSES INCURRED
DURING THE COMPENSATION PERIOD**

Exhibit C sets forth a complete itemization of disbursements incurred by ASK in

connection with services rendered to the Litigation Designees during the Compensation Period.

NOTICE AND OBJECTION PROCEDURES

Notice of this First Monthly Fee Statement shall be given by overnight delivery or email where available upon (i) Sears Holdings Corporation, 3333 Beverly Road, Hoffman Estates, Illinois 60179, Attention: Mohsin Y. Meghji (email: mmeghji@miiipartners.com); (ii) counsel to the Debtors, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, NY 10153, Attention: Ray C. Schrock (email: ray.schrock@weil.com), Jacqueline Marcus (email: jacqueline.marcus@weil.com), Garrett A. Fail (email: garrett.fail@weil.com), and Sunny Singh (email: sunny.singh@weil.com); (iii) William K. Harrington, the United States Trustee, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, NY 10014, Attention: Paul Schwartzberg (e-mail: paul.schwartzberg@usdoj.gov) and Richard Morrissey (e-mail: richard.morrissey@usdoj.gov); (iv) counsel to Bank of America, N.A., Skadden, Arps, Slate, Meagher & Flom LLP, 4 Times Square, New York, NY 10036, Attention: Paul D. Leake (email: paul.leake@skadden.com), Shana A. Elberg (email: shana.elberg@skadden.com) and George R. Howard (email: george.howard@skadden.com); (v) Paul E. Harner, fee examiner, 1675 Broadway, New York, NY 10019 (e-mail: harnerp@ballardspahr.com); and (vi) counsel to the fee examiner, Ballard Spahr LLP, 1675 Broadway, New York, NY 10019, Attention: Vincent J. Marriott (e-mail: marriott@ballardspahr.com) and Tobey M. Daluz (e-mail: daluzt@ballardspahr.com) (collectively, the “Notice Parties”).

Objections to this First Monthly Fee Statement, if any, must be filed with the Court and served upon the Notice Parties so as to be received no later than + **14 days of filing, 2020** (the “Objection Deadline”), setting forth the nature of the objection and the amount of fees or expenses at issue (an “Objection”).

If no Objections to this First Monthly Fee Statement are filed and served as set forth above, the Debtors shall promptly pay the fees and expenses identified herein.

If an Objection to this First Monthly Fee Statement is received on or before the Objection Deadline, the Debtors shall withhold payment of that portion of this First Monthly Fee Statement to which the Objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such an Objection is not resolved, it shall be preserved and scheduled for consideration at the next interim fee application hearing to be held by the Court.

Dated: December 30, 2020

ASK LLP

/s/ Kara E. Casteel

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-and-

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*Counsel for Sears Holdings Corporation, and its
debtor affiliates, debtors and debtors in possession*

Exhibit A

Timekeeper Summary

Name of Professional	Position	Hourly Billing Rate	Total Hours Billed	Total Compensation
Steinfeld, Joseph	Partner	\$800.00	7.34	\$5,866.60
Casteel, Kara	Partner	\$675.00	67.80	\$45,765.00
Reding, Richard	Partner	\$675.00	11.70	\$7,897.50
Miskowiec, Laurie	Paralegal	\$300.00	1.50	\$450.00
Hepola, Jennifer	Paralegal	\$300.00	30.25	\$9,075.00
Esslinger, Jean	Paralegal	\$300.00	4.70	\$1,410.00
Thibodeau, Andrew	Data Analyst	\$375.00	1.50	\$562.60

Exhibit B

Itemized Fees

		<u>Hrs/Rate</u>	<u>Amount</u>
9/22/2020	KC Draft Letter Draft engagement letter	1.50 675.0/hr	1,012.5
9/24/2020	JS Conference Telephone conference with Zensky, Dean Chapman of Akin, Kara Casteel and Jay Reding of ASK to go over spreadsheets and information needed to begin work on complaint.	0.75 800.0/hr	600.0
	JS Preparation Review and edit Retention Letter. Telephone conference with Kara Casteel re changes to draft.	0.75 800.0/hr	600.0
	RJR Analysis Prepare for and attend call regarding shareholder suits; review existing Lampert complaint and follow up on status of pending motions to dismiss in Lampert actions	1.40 675.0/hr	945.0
	KC Correspondence Phone call with Akin to go over initial issues, coordination, receiving documents, follow up email to Akin with questions, internal emails to begin discussing logistics for filing	1.00 675.0/hr	675.0
9/25/2020	JS Conference Staffing conference for case.	0.25 800.0/hr	200.0
	KC Team Meeting Internal phone conf. for logistics moving forward with complaint, corp search, etc.; EM Akin for status on dropbox	0.40 675.0/hr	270.0

			<u>Hrs/Rate</u>	<u>Amount</u>
9/29/2020	RJR	Review Investigate issues surrounding predicate creditor pleading; review and analysis of research provided by Akin regarding the same	1.60 675.0/hr	1,080.0
	RJR	Preparation Review and analysis of defendant data provided by client	0.30 675.0/hr	202.5
9/30/2020	KC	File Review review sharefiles for address info, review the type of information provided	1.50 675.0/hr	1,012.5
10/1/2020	KC	File Review continue to review sharefiles for address info and type/amount of information provided for shareholders	2.00 675.0/hr	1,350.0
10/5/2020	KC	File Review continue review of sharefiles for address info and type/amount of information provided	1.50 675.0/hr	1,012.5
	KC	Phone client emails and phone calls with Akin to confirm size of defendant list based on damage amount asserted	0.50 675.0/hr	337.5
10/6/2020	RJR	Draft Pleading Review first amended complaint in Lampert fraudulent transfer action and identify sections to be removed for shareholder litigation complaint; begin creation of shareholder litigation complaint	4.20 675.0/hr	2,835.0
	KC	Hearing Listen line for subpoena objection hearing	0.30 675.0/hr	202.5
	KC	Draft Start review/edits for declaration of disinterestedness	0.60 675.0/hr	405.0
	KC	Draft compile names for conflict search from UCC categories listed	0.40 675.0/hr	270.0
10/7/2020	RJR	Draft Pleading Continue revisions to proposed shareholder suit complaint; review Procedures for filing under seal.	2.30 675.0/hr	1,552.5
10/8/2020	JS	Document Review Review and edit Declaration of Disinterestedness.	0.75 800.0/hr	600.0
	RJR	Draft Pleading Revise proposed complaint	0.70 675.0/hr	472.5
	KC	Draft Finish compiling names for conflict search	0.30 675.0/hr	202.5
	KC	Draft Finish draft of declaration of disinterestedness	1.20 675.0/hr	810.0

			<u>Hrs/Rate</u>	<u>Amount</u>
10/9/2020	LNP	Review Review Conflicts	1.00 300.0/hr	300.0
	KC	Correspondence f/u email to Akin on address questions	0.10 675.0/hr	67.5
	KC	Correspondence email to Moritt for address info for subpoenas, question on entities	0.20 675.0/hr	135.0
10/10/2020	KC	Draft receive comments back from Akin, small additional edits	0.20 675.0/hr	135.0
	KC	Draft Finalize dec, send to Akin with comments	0.30 675.0/hr	202.5
	KC	File Review Advise re:Review MHH email with any address info for funds, update public defendants chart with Vanguard info for multiple funds under Vanguard family	0.40 675.0/hr	270.0
	KC	File Review Start review of amended complaint for main shareholder action	0.50 675.0/hr	337.5
	KC	Draft Start review & edit draft of complaint	0.20 675.0/hr	135.0
10/11/2020	KC	Correspondence Follow up email with MHH about Vanguard numbers in public shareholder chart	0.20 675.0/hr	135.0
	KC	Draft Continue review of main shareholder amended complaint and finalizing edits to our proposed draft complaint	3.00 675.0/hr	2,025.0
	KC	File Review Continue pulling address info for corp searches, internal emails concerning corp searches and filing	0.30 675.0/hr	202.5
10/12/2020	JS	Document Review Reviewed draft Shareholder Complaint. Made substantive changes. Zoom meeting with Kara Casteel and Richard Reding to go over changes and comments.	1.67 800.0/hr	1,333.3
	JS	Correspondence Review final change to my Declaration of Disinterestedness. Email to Sara Brauner of Akin confirming ok to send to UST and client.	0.50 800.0/hr	400.0
	JH	Miscellaneous Corporate searches	5.67 300.0/hr	1,700.0
	AT	Analysis Address Import & Exhibit Discussion	0.25 375.0/hr	93.8

			<u>Hrs/Rate</u>	<u>Amount</u>
10/12/2020	LNP	Factual Research Research on information for possible defendants on SEC website.	0.50 300.0/hr	150.0
	KC	Correspondence Emails with Akin to finalize declaration	0.50 675.0/hr	337.5
	KC	Legal Research defendant entity search, entry of addresses into defendant matrix, follow up research	0.50 675.0/hr	337.5
10/13/2020	JH	Miscellaneous Corporate Searches	2.00 300.0/hr	600.0
	KC	Draft continue review of defendant entity search results, conduct additional searches for proper entity identification and legal status, update defendant matrix with families and addresses	4.00 675.0/hr	2,700.0
	KC	Draft draft Exhibit A	0.50 675.0/hr	337.5
	KC	Legal Research entity search review continues, questions to Melodie and Sheila, review share files concerning Vanguard entity issue, review Vanguard and D.E. Shaw info for discrepancies in numbers	3.00 675.0/hr	2,025.0
	KC	Draft review complaint edits with Akin, implement edits and finalize	0.50 675.0/hr	337.5
10/14/2020	JS	Conference Email, text and phone calls with Kara Casteel regarding problems with Defendant addresses and ability to file complaint by midnight on Oct. 14. Telephone conference with Dean Chapman of Akin advising him of issues. Review legal research memo and case law.	1.00 800.0/hr	800.0
	KC	Correspondence Internal emails and phone calls re: defendant addresses and final list, ECF errors and issues	0.50 675.0/hr	337.5
	KC	Legal Research Receive list of multiple new defendants to add from Akin. Begin and complete corporate searches for new entities, add into defendant with addresses and legal entity status matrix, consolidate with existing defendant families if necessary	6.00 675.0/hr	4,050.0
	KC	Correspondence Emails and phone calls with filing service re: defendant matrix entry with addresses, transmittal of final filing documents, ECF filing error screen, ECF issues	1.50 675.0/hr	1,012.5
	KC	Correspondence Emails with Akin and Morritt on missing new defendant names, addresses, family consolidation, naming issues, confirming share amounts, threshold defendant issues, and filing issues, work on	2.50 675.0/hr	1,687.5

		<u>Hrs/Rate</u>	<u>Amount</u>
	complaint and defendant matrix after discussion		
10/14/2020	KC Draft Finalizing Exhibit A, redacting of Exhibit A, finalizing of complaint with new defendant information	1.50 675.0/hr	1,012.5
10/15/2020	AT Analysis Address Discussion	0.25 375.0/hr	93.8
	AT Analysis Defendant Address Importing	1.00 375.0/hr	375.0
	JS Correspondence Email correspondence to and from Dean Chapman of Akin on problems with SDNY filing system accepting multi defendant complaint.	0.25 800.0/hr	200.0
	JS Correspondence Several emails to Kara Casteel and Gene Mathews of Reliable about getting the complaint filed asap. reviewed final version and how to handle defendant addresses.	0.75 800.0/hr	600.0
	KC Draft Update defendant info/searches, update complaint with additional information on certain defendants, update Exhibit A with additional information on certain defendants	3.00 675.0/hr	2,025.0
	KC Phone client Calls and emails with filing service on attempts to file complaint with reduced number of defendants	0.70 675.0/hr	472.5
	KC Phone client Calls into court re: ECF filing issues day prior, discussion with clerk on adding additional defendants	0.40 675.0/hr	270.0
	KC Correspondence Emails with Akin re: additional defendant info, filing status	0.40 675.0/hr	270.0
10/19/2020	KC Correspondence Draft and send email to fee examiner with inquiry on submission of time post-confirmation retention	0.50 675.0/hr	337.5
10/20/2020	JH Miscellaneous Entering corporate information into SOAR	6.50 300.0/hr	1,950.0
10/21/2020	KC File Review Work with staff on missing addresses, foreign addresses, service including foreign, cover letter for service	0.50 675.0/hr	337.5
	KC Correspondence Emails with Akin and Morritt on missing addresses	0.30 675.0/hr	202.5
	JE Miscellaneous entered corp search data into SOAR	2.50 300.0/hr	750.0

			<u>Hrs/Rate</u>	<u>Amount</u>
10/21/2020	JH	Miscellaneous Entering corporate searches into SOAR and prepping documents for service.	6.33 300.0/hr	1,900.0
	KC	Phone client Phone call with Akin on meetings with client and status of service, motion to consolidate, etc.	0.30 675.0/hr	202.5
10/22/2020	JH	Miscellaneous Prepping documents for service.	6.50 300.0/hr	1,950.0
10/23/2020	KC	Correspondence Email with Akin re: status of service, complaint, next steps	0.20 675.0/hr	135.0
	JH	Miscellaneous Mailing service documents and filing Certificate of Service with the Court.	2.00 300.0/hr	600.0
10/27/2020	KC	Correspondence Initial correspondence-response with Prescott defendant group	0.10 675.0/hr	67.5
10/30/2020	KC	Correspondence Follow up with Morritt on inquiries to subpoena recipients on missing information	0.10 675.0/hr	67.5
11/2/2020	KC	File Review Review interim fee order and fee examiner order for fee submission and payment process	0.60 675.0/hr	405.0
11/3/2020	KC	Correspondence Follow up emails with fee examiner office	0.10 675.0/hr	67.5
11/5/2020	KC	Correspondence Responded to initial contact request for extension from counsel for Employee Retirement System of Texas, prepared and provided them with redacted Exhibit A as to their client	0.30 675.0/hr	202.5
11/9/2020	JS	Correspondence Emails from and to Kara and Telephone call to client concerning call with David Zensky and Dan Chapman and how to handle various defendants requesting extension of time, Correspondence with Sabin Willet of Morgan Lewis who rep some defendants about scheduling responses until after court rules on MTD. Review multiple emails on status of case.	0.67 800.0/hr	533.3
	KC	Correspondence Call & several emails for counsel for GSO & Goldmans defendants re: response date and unredacted Ex A	0.40 675.0/hr	270.0
	KC	Draft Create partial unredacted Exhibit As to distribute to counsel for multiple cases	0.60 675.0/hr	405.0

			<u>Hrs/Rate</u>	<u>Amount</u>
11/9/2020	KC	Correspondence Emails with Akin re: status of contacts and timing issues	0.30 675.0/hr	202.5
	KC	Phone Opp Atty Called back counsel for Fine Capital Partners and has discussion and sent f/u email	0.40 675.0/hr	270.0
	KC	Phone Opp Atty Phone call with Morgan Lewis and Akin re: group of defendants, timing issues	0.40 675.0/hr	270.0
	KC	Update Chart Update defendant chart with contact information and statuses	0.30 675.0/hr	202.5
11/10/2020	JE	Advise entered def counsel into SOAR	0.40 300.0/hr	120.0
	KC	Phone Opp Atty Phone call with counsel for GSO & Goldmans con'td discussion on timing	0.20 675.0/hr	135.0
11/11/2020	KC	Phone Opp Atty Phone call/emails with counsel for Prescott entities	0.50 675.0/hr	337.5
	KC	Phone Opp Atty Phone call/emails with counsel for Hap Trading and Renaissance entities	0.50 675.0/hr	337.5
	KC	Phone Opp Atty Phone call/email with GC for Horizon entities	0.40 675.0/hr	270.0
	KC	Draft Create partially unredacted Exhibit As for Prescott, Hap Trading, Renaissance, and Horizon entities	0.70 675.0/hr	472.5
	KC	Correspondence Emails with Akin re certain legal issues	0.30 675.0/hr	202.5
	KC	Correspondence Emails to Morgan Lewis f/u	0.20 675.0/hr	135.0
11/12/2020	KC	Phone Opp Atty Phone call and follow-up email with Tisch representative	0.20 675.0/hr	135.0
	KC	Phone Opp Atty Phone call and follow-up emails with Morgan Lewis on multiple defendants	0.60 675.0/hr	405.0
	KC	Correspondence Emails with general counsel for MUFG and review of certain documents related thereto	0.40 675.0/hr	270.0

			<u>Hrs/Rate</u>	<u>Amount</u>
11/12/2020	KC	Update Chart Updating internal records on status of extensions and initial contact notes for multiple defendants	1.00 675.0/hr	675.0
	KC	Draft Partial redaction Exhibit As for multiple defendant groups represented by Morgan Lewis, AQR, HBOS, and MUFG to provide to counsel	2.20 675.0/hr	1,485.0
	KC	Phone Opp Atty Phone call and follow-up email with AQR counsel	0.30 675.0/hr	202.5
	KC	Phone Opp Atty Phone call and follow-up email with HBOS counsel	0.30 675.0/hr	202.5
11/13/2020	KC	Phone Opp Atty Emails and phone call with Maverick counsel and review of certain subpoena documents related thereto	0.70 675.0/hr	472.5
	KC	Correspondence Emails with Lockheed & Mason counsel	0.20 675.0/hr	135.0
	KC	Draft Partial redaction of Exhibit As for multiple defendants to provide to counsel	0.50 675.0/hr	337.5
	RJR	Analysis Discussion and investigation into potential Section 546(e) safe harbor issues	0.70 675.0/hr	472.5
	KC	Update Chart Updating internal records on status of extensions and initial contact notes for multiple defendants	0.50 675.0/hr	337.5
	KC	Phone client Phone call with Akin concerning litigation procedural issues and f/u emails	0.70 675.0/hr	472.5
11/16/2020	KC	Update Chart Updating internal records on status of extensions and initial contact notes for multiple defendants	0.30 675.0/hr	202.5
	KC	Phone Opp Atty Phone call with Norges Bank representative	0.40 675.0/hr	270.0
	KC	Correspondence Further emails with Morgan Lewis on additional defendants	0.20 675.0/hr	135.0
	KC	Draft Pleading draft sample extension stipulation and order	0.30 675.0/hr	202.5
	JE	Advise entered def counsel into SOAR	1.00 300.0/hr	300.0

			<u>Hrs/Rate</u>	<u>Amount</u>
11/16/2020	KC	Correspondence Initial email contact with Barclays counsel	0.20 675.0/hr	135.0
	KC	Draft partial redaction Exhibit A for Barclays, Tobam, and Karlin	0.50 675.0/hr	337.5
	KC	Draft Pleading draft Blackstone and Goldman Sachs stipulations	0.30 675.0/hr	202.5
11/17/2020	JH	Miscellaneous Entering returned certified cards into SOAR and handling return mail.	1.25 300.0/hr	375.0
	KC	Correspondence emails with Morgan Lewis	0.30 675.0/hr	202.5
11/18/2020	KC	Phone Opp Atty phone call with Bank of Bermuda counsel; f/u email	0.40 675.0/hr	270.0
	KC	Correspondence email with counsel extension granted for Timonthy Palmer and Kenden Alford	0.10 675.0/hr	67.5
	KC	Update Chart Updating internal records on status of extensions and initial contact notes for multiple defendants	0.30 675.0/hr	202.5
	KC	Correspondence emails with Morgan Lewis	0.20 675.0/hr	135.0
	KC	Correspondence Email with counsel for DFA	0.20 675.0/hr	135.0
	KC	Phone Opp Atty phone call with Prescott atty	0.30 675.0/hr	202.5
11/19/2020	KC	Review review subpoena documents for DE Shaw	1.00 675.0/hr	675.0
	KC	Correspondence emails with Akin concerning subpoena documents	0.30 675.0/hr	202.5
	KC	Correspondence emails with Morgan Lewis concerning subpoena documents	0.30 675.0/hr	202.5
	JE	Advise entered def counsel into SOAR	0.50 300.0/hr	150.0
11/20/2020	RJR	Conference Analyze potential issues with Goldman Sachs claims and defenses	0.50 675.0/hr	337.5
	KC	Correspondence emails with MHH concerning subpoena documents	0.10 675.0/hr	67.5

		<u>Hrs/Rate</u>	<u>Amount</u>
11/20/2020	KC Correspondence emails with Akin concerning status	0.30 675.0/hr	202.5
11/23/2020	KC Phone Opp Atty Phone call with counsel for Gothic	0.30 675.0/hr	202.5
11/24/2020	KC Review review subpoena documents for State Street, prepare redacted versions for production	1.00 675.0/hr	675.0
11/25/2020	KC Draft partial redaction of Exhibit A to provide to counsel (Bermuda)	0.20 675.0/hr	135.0
	KC Correspondence emails to Akin and Morgan Lewis concerning State Street, other defendants	0.30 675.0/hr	202.5
	KC Correspondence email to Bermuda counsel	0.10 675.0/hr	67.5
	KC Review further review of State Street and DTC underlying subpoena documents	2.00 675.0/hr	1,350.0
11/30/2020	JE Advise entered def counsel into SOAR	0.30 300.0/hr	90.0
For professional services rendered		<u>124.79</u>	<u>\$71,026.7</u>

	<u>Amount</u>
Balance due	<u>\$72,053.3</u>

Timekeeper Summary			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Joseph Steinfeld	7.34	800.0	\$5,866.6
Kara Casteel	63.40	675.0	\$42,795.0
Kara Casteel	4.40	675.0	\$2,970.0
Richard J. Reding	11.70	675.0	\$7,897.5
Andrew Thibodeau	1.50	375.0	\$562.6
Jean Esslinger	4.70	300.0	\$1,410.0
Jennifer Hepola	30.25	300.0	\$9,075.0
Laurie N. P. Miskowiec	1.50	300.0	\$450.0

Exhibit C

Itemized Expenses

Disbursement Activity	Amount
Computerized Legal Research - Westlaw	\$75.20
Postage	\$595.80
Court Fee – Complaint Filing	\$350.00
Telephone	\$3.60
Computerized Legal Research - Other	\$2.00